
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Howard Dotson

Plaintiff(s),

vs.

Case No. 23-CV-1741 (JWB/ECW)
(To be assigned by Clerk of District Court)

Harding Smith

DEMAND FOR JURY TRIAL

YES ☒ NO ☐

Defendant(s).

(Enter the full name(s) of ALL defendants in
this lawsuit. Please attach additional sheets
if necessary).

RECEIVED

JUN 09 2023

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

COMPLAINT

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff

Name	Howard Dotson
Street Address	5960 Anna Ave # 103
County, City	Anoka Fridley
State & Zip Code	MN 55432
Telephone Number	(763) 600-9078

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1

Name	Harding Smith
Street Address	3978 W Broadway Ave
County, City	Hennepin Robbinsdale
State & Zip Code	MN 55422

b. Defendant No. 2

Name	
Street Address	
County, City	
State & Zip Code	

c. Defendant No. 3

Name	
Street Address	
County, City	
State & Zip Code	

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

JURISDICTION

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

☒ Federal Question ☐ Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

Violation of Constitutionally protected 1st Amendment rights

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: _____ State of Citizenship: _____

Defendant No. 1: _____ State of Citizenship: _____

Defendant No. 2: _____ State of Citizenship: _____

Attach additional sheets of paper as necessary and label this information as paragraph 5.

Check here if additional sheets of paper are attached. ☐

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

☐ Defendant(s) reside in Minnesota ☒ Facts alleged below primarily occurred in Minnesota

☐ Other: explain _____

STATEMENT OF THE CLAIM

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

7.

On Sunday May 30th at Elim Lutheran Church in Robbinsdale we were gathered at the church location with the expressed permission of Pastor Dan of Elim Lutheran Church for a demonstration against Harding Smith and MN Acts Now which offices at this location.

We coordinated with Robbinsdale PD for protected 1st Amendment activity.

Harding Smith called Robbinsdale PD and made a false report about us being banned from the church property. This resulted in Robbinsdale PD responding to scene and directing us to move to a location that was contrary to where Pastor Dan asked us to be on the church grounds.

Harding Smith fraudulent activity infringed on our protected 1st Amendment rights. He committed slander that resulted in damage to personal and professional reputation.

As evidence we will be disposing Pastor Dan, the officers who responded to the scene and submitting as evidence the CAD log from Robbinsdale PD.

On May June 1 Harding Smith attempted the same actions at Brooklyn Park City Council meeting. I had already coordinated with the Brooklyn Park Police Chief about our 1st amendment

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached: ☐

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

We are demanding legal remedy of 1 Million for 1st Amendment infringement, emotional distress and slander that resulted in damage to my personal and professional reputation.

Signed this 9th ☐ day of June, ☐ _____

Signature of Plaintiff 

Mailing Address **5960 Anna Ave #103
Fridley MN**

Telephone Number **(763) 600-9078**

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.